

REMARKS

This Amendment is in response to the Office Action dated July 2, 2007 ("OA"). In the Office Action, claims 3, 4, 14, 15, 18 and 19 were rejected under 35 USC §112 and claims 1-28 were rejected under 35 USC §103. By this amendment, claims 14 and 15 are amended, and claims 3, 4, 18 and 19 are canceled. Claims 1, 2, 5-17 and 20-28 are believed allowable, with claims 1, 6 and 22 being independent claims.

CLAIM REJECTIONS UNDER 35 USC §112:

Claims 3, 4, 18 and 19

Claims 3, 4, 18 and 19 were rejected under 35 USC §112 as being indefinite and failing with the enablement requirement. By this amendment, claims 3, 4, 18 and 19 are canceled. Thus, the rejections of claims 3, 4, 18 and 19 are moot.

Claims 14-15

Claims 14 and 15 were rejected under 35 USC §112 due to insufficient antecedent basis. Specifically, the claims recited the limitation "... the method of claim 2, wherein the models . . .", while claim 2 does not recite "models". OA, pg. 5.

By this amendment, claims 14 and 15 are amended to recite "... the method of claim 13, wherein the models" Claim 13 recites "models". Thus, the Applicants respectfully submit that claims 14 and 15 now have sufficient antecedent basis. The Applicants thank the Examiner for pointing out this typographical error.

For at least these reasons, claims 14 and 15 are believed allowable. The Applicants respectfully request reconsideration and allowance of claims 14 and 15.

CLAIM REJECTIONS UNDER 35 USC §103:

Claims 1, 6, 9, 10, 12, 16, 21 and 22 were rejected under 35 USC §103 as unpatentable over U.S. Patent No. 6,084,684 issued to Stubler et al. ("Stubler") in view of U.S. Patent No. 6,043,819 issued to LeBrun et al. ("LeBrun"). OA, pg. 5.

Claims 2-5 and 17-20 were rejected under 35 USC §103 as unpatentable over Stubler in view of LeBrun and further in view of U.S. Patent No. 6,718,063 issued to Lennon et al. ("Lennon"). OA, pg. 9.

Claims 7, 8, 11 and 13-15 were rejected under 35 USC §103 as unpatentable over Stubler in view of LeBrun and further in view of U.S. Patent No. 5,963,670 issued to Lipson et al. ("Lipson"). OA, pg. 11.

Claims 23, 25 and 27 were rejected under 35 USC §103 as unpatentable over Stubler in view of LeBrun and further in view of U.S. Patent No. 6,697,799 issued to Neal et al. ("Neal"). OA, pg. 15.

Claims 24, 26 and 28 were rejected under 35 USC §103 as unpatentable over Stubler in view of LeBrun and further in view of Neal and further in view of U.S. Patent No. 6,816,847 issued to Toyama ("Toyama"). OA, pg. 16.

A *prima facie* case for obviousness can only be made if the combined reference documents teach or suggest all the claim limitations. MPEP 2143.

Claim 1

Claim 1 recites, in part, ". . . actively selecting examples of multimedia content to be annotated by a user, wherein the examples of multimedia content are selected based on at least one criterion for achieving a maximal disambiguation result such that only those examples which are most ambiguous are selected" It is emphasized that claim 1 requires at least one criterion for achieving a maximal disambiguation result such that only those examples which are most ambiguous are selected.

As an initial matter, the Applicants respectfully submit that even assuming, *arguendo*, that Stubler in view of LeBrun contain the teachings alleged by the Examiner, the Office Action does not provide any prior art reference disclosing at least one criterion for achieving a maximal disambiguation result such that only those examples which are most ambiguous are selected, as is required by claim 1.

Turning to the details of the Office Action, the Examiner alleges that col. 3, ln. 49-51; col. 10, ln. 4-8; col. 18, ln. 16-20 and col. 21, ln. 20-24 of LeBrun teach the above cited limitation of claim 1. OA, pg. 6-7. The Examiner further alleges, "LeBrun teaches a database of graphic document images which are automatically identified (*annotated*) by an image character reader. Images not automatically identified (*annotated*) by the image character reader are queued for manual identification/classification by human operators looking sequentially at a screen or queue of images and keying in the identification." *Id.*

An image which cannot be identified is not equivalent to an image which is ambiguous. For example, an image may be unambiguous, but a system may nonetheless fail to automatically identify the image because it was not programmed to identify that particular image. Thus, whether an image was automatically identified cannot be equivalent to a criterion for achieving a maximal disambiguation result such that only those examples which are most ambiguous are selected. Therefore, routing images which cannot be automatically identified to a human being cannot be equivalent to actively selecting examples of multimedia content to be annotated by a user, wherein the examples of multimedia content are selected based on at least one criterion for achieving a maximal disambiguation result such that only those examples which are most ambiguous are selected.

Regarding the passages of LeBrun cited by the Examiner, the first cited passage recites:

The next step relates to the identification of the document which now resides in the system as a unique captured electronic image or graphics screen. The software in the LeBrun, col. 3, ln. 49-51.

The cited passage discloses identification of a document. However, the passage does not disclose a criterion on which the identification is based.

The second passage cited by the Examiner recites:

. . . as belonging to the first transaction. When the control computer 140 receives the signal, logical separation is established by suitable methods such as a unique data key to locate the database addresses of the graphics images of each of the documents, and subsequent character data interpreted from graphical data areas of each graphics image. LeBrun, col. 10, ln. 4-9.

The cited passage appears to disclose logical separation of documents. The passage further discloses that character data are interpreted from graphical data areas of graphics images. However, logical separation and interpreting character data from graphical data are clearly not equivalent to actively selecting examples of multimedia content to be annotated by a user. Furthermore, logical separation and interpreting character data from graphical data are clearly not equivalent to at least one criterion for

achieving a maximal disambiguation result such that only those examples which are most ambiguous are selected.

The third passage cited by the Examiner recites:

. . . inverted orientations. Graphics screen images of documents that are not identified automatically by the image character reader 34, are queued for manual identification by human operators looking sequentially at a screen or queue of images and keying in the identification. "White mail" (items . . . LeBrun, col. 18, ln. 16-20.

The cited passage discloses that documents which are not identified automatically are queued for manual identification by human operators. However, for the reasons previously noted, whether a document was identified automatically cannot be equivalent to a criterion for achieving a maximal disambiguation result such that only those examples which are most ambiguous are selected. It follows that queuing documents which could not be identified automatically for manual identification by a human operator cannot be equivalent to actively selecting examples of multimedia content to be annotated by a user, wherein the examples of multimedia content are selected based on at least one criterion for achieving a maximal disambiguation result such that only those examples which are most ambiguous are selected.

The fourth and final passage cited by the Examiner recites:

Step 104 relates to the "address" or location of the image in storage. A variety of data elements are cross-referenced, one to another, and assembled in a database. A data-base can be as simple as a "flat file," random or can be constructed upon some relational database model. LeBrun, col. 21, ln. 21-25 (cited by the Examiner as col. 21, ln. 20-24.)

The cited passage discloses storage in a database. However, storage in a database is clearly not equivalent to actively selecting examples of multimedia content to be annotated by a user. Furthermore, storage in a database is clearly not equivalent to at least one criterion for achieving a maximal disambiguation result such that only those examples which are most ambiguous are selected.

The Applicants respectfully submit that none of the four passages of LeBrun cited by the Examiner teach or suggest a criterion for achieving a

maximal disambiguation result such that only those examples which are most ambiguous are selected. Therefore, none of the four passages of LeBrun teach or suggest the limitation of claim 1 requiring actively selecting examples of multimedia content to be annotated by a user, wherein the examples of multimedia content are selected based on at least one criterion for achieving a maximal disambiguation result such that only those examples which are most ambiguous are selected.

LeBrun teaches a specific method for automatically identifying documents in the following passage:

There are two different ways which may be used to automatically identify forms in step 90. One of the ways is to use the image recognition system 34 to recognize a graphical representation of the identifying word of the form. Each form has a specific geographic identification area containing a specific identification word or words. In order to accomplish this, a pre-chosen series of identifiers is processed against portions of the graphics image. If a match is found, its location within the graphics image is identified as the geographic identification area. Once the geographic identification area is found and identified, other graphical data areas can be located a vector distance measured in binary bits from the identification area.

One of the pre-chosen identifier may be the word "exemptions" as it appears in the upper right margin of the IRS Form 1040. Another may be the word "averagable" as it appears in Schedule G of the IRS Form tax return in the upper middle of the form. LeBrun, col. 18, ln. 26-43 (emphasis added).

Thus, LeBrun teaches that subsets of the image of a document are compared to a pre-chosen series of identifiers. It is thus evident that the method disclosed in the cited passage will fail to identify any document which is an instance of a form for which no identifiers have been preselected. Thus, this method will fail to identify an unambiguous document if no identifiers have been preselected for the form of which the document is an instance. Therefore, whether a document is identified by the method disclosed by LeBrun is clearly not equivalent to a criterion for achieving a maximal disambiguation result such that only those examples which are most ambiguous are selected as is required by claim 1.

The first sentence of the passage cited above clarifies that LeBrun teaches exactly two methods for automatically identifying documents. The second method is disclosed in the following passage:

An alternative means to automatically identify forms pursuant to step 90 is by using the ICR to analyze the same geographic template area of each form and evaluating the distribution of black pel's on the white field. The so-called "signature" of this area is unique to each form. Histograms and intersection counts are two criteria used in the present system. Such counts and transformations hereof are accumulated by the ICR for each horizontal and/or vertical line of pel's within the template area. An advantage of this technique is that only one geographic template area need be developed from each form. LeBrun, col. 18, ln. 56-66 (emphasis added).

Thus, LeBrun teaches that properties of a subset of the image of a document are compared to a geographic template area which was developed from a form. The final sentence of the cited passage clarifies that developing a geographic template area from a form is a prerequisite step to identifying the form. It is thus evident that this second method will fail to identify any document which is an instance of a form for which no geographic template area was previously developed. Thus, this second method will fail to identify an unambiguous document if no geographic template area was previously developed for that document. Therefore, whether a document is identified by this second method is clearly not equivalent to a criterion for achieving a maximal disambiguation result such that only those examples which are most ambiguous are selected as is required by claim 1.

Moreover, both of the methods taught by LeBrun for automatically identifying documents may incorrectly identify an inherently ambiguous document as being a certain form instead of routing the document to a human user. If a document matches a pre-chosen series of identifiers or a geographic template area for a specific form, the document image will be classified as that form. Thus, if a document is inherently ambiguous as to whether it is an instance of form A or of form B, and if a pre-chosen series of identifiers has been selected for form A but not for form B, the document will be incorrectly identified as form A. Similarly, if a document is inherently ambiguous as to whether it is an instance of form A or of form B, and if a geographic template area has been developed for form A but not for form B, the document will be incorrectly identified as form A. In either case, because the ambiguous document was (incorrectly) identified automatically, it is queued for manual identification by a human operator. Thus, a document which was not automatically identified may in fact be ambiguous. For this reason as well, whether an image was automatically identified cannot be equivalent to a criterion for achieving a maximal

disambiguation result such that only those examples which are most ambiguous are selected.

Moreover, obviousness cannot be established by combining prior art to produce the claimed invention absent some teaching or suggestion supporting the combination. In re Fritch, 972 F.2d 1260, 1266, 23 USPQ2d 1780, 1783-84 (Fed. Cir. 1992). The mere fact that the prior art may be modified in the manner suggested by an Examiner does make the modification obvious unless the prior art suggested the desirability of the modification. *Id.*

In rejecting claim 1, the Examiner alleges that “. . . at the time of the invention it would have been obvious to one of ordinary skill in the art to combine Stubler with LeBrun for the benefit of speeding up the process of document (*multimedia annotations*) processing so that a higher volume of transactions can be processed, and reduce the number of errors which are considered to be inherent in a document processing (*multimedia annotations*) operation (col. 3, lines 14-23).” OA, pg. 7.

Stubler teaches “. . . a method for associating captions or semantic information with images in an image database environment.” Stubler, col. 1, ln. 8-10. LeBrun teaches a system configured to extract data from documents. “The system converts documents, such as forms and supporting pages, into digital data which can be used to update computer records and to manage and support the adjudicative processing of business transactions by human operators at computer terminals.” LeBrun, abst. The Applicants respectfully submit that would not be obvious to combine the teachings of Stubler and LeBrun due to the radically different purposes to which the inventions are directed.

Furthermore, because Stubler and LeBrun are directed to such radically different purposes, it is not evident that combining the teachings of Stubler and LeBrun would speed up the process of associating captions or semantic information with images as taught by Stubler. For the same reason, it is not evident that combining the teachings of Stubler and LeBrun would reduce the number of errors which are considered to be inherent in the process of associating captions or semantic information with images as taught by Stubler.

In this light, it is apparent that the only suggestion for combining Stubler and LeBrun in the manner advanced by the Examiner stems from hindsight knowledge impermissibly derived from the Applicant's disclosure.

For at least these reasons, claim 1 is believed allowable. The Applicants respectfully request reconsideration and allowance of claim 1.

Claims 2 and 5-14

Claims 2 and 5-14 are dependent on and further limit claim 1. Since claim 1 is believed allowable, claims 2 and 5-14 are also believed allowable for at least the same reasons as claim 1.

Claim 15

Claim 15 recites, "The method of claim 13, wherein the models are based on nearest neighbor voting or variants, parametric or statistical models, expert systems, rule-based systems, or hybrid techniques."

In rejecting claim 15, the Examiner argues that Lipson teaches "the use of models for each annotation or for joint annotations." The Applicants respectfully submit that claim 15 does not recite the subject matter alleged by the Examiner.

For at least this reason, and the reasons given for claim 1, claim 15 is believed allowable. The Applicants respectfully request reconsideration and allowance of claim 15.

Claim 16

Claim 16 is rejected under the same rationale as claim 1. OA, pg. 5. Thus, claim 16 is believed allowable for at least the reasons provided above regarding claim 1. The Applicants therefore respectfully request reconsideration and allowance of claim 16.

Claims 17 and 20-21

Claims 17 and 20-21 are dependent on and further limit claim 16. Since claim 16 is believed allowable, claims 17 and 20-21 are also believed allowable for at least the same reasons as claim 16.

Claim 22

Claim 22 is rejected under the same rationale as claim 1. OA, pg. 5. Thus, claim 22 is believed allowable for at least the reasons provided above regarding claim 1. The Applicants therefore respectfully request reconsideration and allowance of claim 22.

Claim 23

Claim 23 is dependent on and further limits claim 1. Since claim 1 is believed allowable, claim 22 is also believed allowable for at least the same reasons as claim 1.

Claim 24

Claim 24 is dependent on claim 1 and recites, "The method of claim 1, wherein the at least one criterion includes a confidence level of the selected examples, the confidence level being inversely proportional to a distance of a new feature of the selected examples from a separating hyperplane in an induced higher dimensional feature space." It is emphasized that claim 24 requires inverse proportionality between the confidence level and the distance of a new feature of the selected examples from a separating hyperplane.

Furthermore, the antecedent basis of "the at least one criterion" is found in the limitation of claim 1 which recites, ". . . actively selecting examples of multimedia content to be annotated by a user, wherein the examples of multimedia content are selected based on at least one criterion for achieving a maximal disambiguation result such that only those examples which are most ambiguous are selected" Thus, it is evident that the criterion of claim 24 is employed to select examples of multimedia content.

The Examiner alleges that col. 5, ln. 47 through col. 6, ln. 50 of Toyama teach the limitation introduced by claim 24. OA, pg. 17. The Examiner further alleges, "Toyama teaches a SVM classifier by identifying a hyperplane that separates a set of positive and negatives examples with a maximum margin. Toyama further teaches, the quality of the learned classifiers for aesthetic image judgment can be enhanced by inputting to the feature selection procedures that are useful for distinguishing different aesthetic among images." *Id.*

The passage cited by the Examiner discloses a method of training a classifier. The first sentence of the cited passage clarifies this fact, stating, "In 202, the input training set is used to training [sic] a classifier." Toyama, col. 5, ln. 47. The cited passage is the entire description of method step 202 of Toyama. However, the cited passage fails to teach employing the classifier to analyze an image. As noted above, claim 24 requires a criterion which is employed to select examples of multimedia

content. Thus, the cited passage, standing alone, clearly cannot teach the criterion of claim 24.

However, the following passage of Toyama discloses analyzing an image using the classifier:

Thus, in 302, the classifier is used to generate an aesthetic score for the image. That is, the classifier as previously trained with a training set is used. The classifier uses the same feature selection it applied against the set of training images to determine the aesthetic score for the image, consistent with the methodology or scheme of the particular classifier used (e.g., a Bayesian classifier, an SVM, etc.). The classifier thus generates a numerical value of the image, or probabilities that the image falls into one or more aesthetical classes, or just the aesthetical class into which the image has the highest probability of being located--all of these are considered the "aesthetic score" of the image, as used herein. Toyama, col. 7, ln. 7-19.

An anticipating reference must provide an enabling disclosure of the desired subject matter; mere naming or description of the subject matter is insufficient, if it cannot be produced without undue experimentation. MPEP 2121.01, citing *Elan Pharm., Inc. v. Mayo Found. For Med. Educ. & Research*, 346 F.3d 1051, 1054, 68 USPQ2d 1373, 1376 (Fed. Cir. 2003).

The Applicants respectfully submit that the cited passage fails to teach or suggest a method by which the aesthetic score is calculated. The passage teaches generating a "numerical value of the image." However, the passage fails to disclose a method for calculating this numerical value other than the broad teaching that "[t]he classifier uses the same feature selection it applied against the set of training images to determine the aesthetic score for the image, consistent with the methodology or scheme of the particular classifier used" Such a broad statement clearly does not obviate the claim language of wherein ". . . the confidence level being inversely proportional to a distance of a new feature of the selected examples from a separating hyperplane in an induced higher dimensional feature space."

Toyama discloses additional methods for analyzing an image using the classifier:

In one embodiment of the invention, a gradient ascent, as known within the art, is used to generate these recommendations. The gradient ascent is applied against the feature-vector space of the image, where "feature vectors" are as defined earlier. A classifier as described in

the previous section effectively maps feature vectors in the feature vector space to single numeric scores. Gradient ascent proceeds by varying individual or sets of values in a feature vector by small amounts in an attempt to find a local region of the feature-vector space that results in a higher score than the image originally classified. Thus applied, the gradient ascent ascends locally to one or more points in the feature-vector space that maximize the aesthetic score that is given to the image. That is, the gradient ascent determines which aspects of the image are causing the image's aesthetic score to not be maximized, such that the user can change those aspects in order to improve the score.

In another embodiment of the invention, a local search is performed, as known within the art, to generate the recommendations. For example, feature vector values within a predetermined range are modified to determine the value that maximizes the aesthetic score for the image. In addition, a gradient ascent with multiple restarts in areas of the feature-vector space that are farther out can be used to generate the recommendations. In the case of multiple restarts, the adjustment made to the original feature vector for each "restart" may be fairly large, allowing the technique to search in a greater region of the feature-vector space than allowed by the local search or gradient ascent techniques alone. In general, embodiments of the invention are inclusive of any manner by which optima can be determined for features used by the classifier to generate the aesthetic score for an image. Toyama, col. 7, ln. 46 through col. 8, ln. 11.

The Applicants respectfully submit that both the gradient ascent and the local search disclosed by Toyama are clearly not equivalent to a confidence level which is inversely proportional to a distance of a new feature of selected examples from a separating hyperplane in an induced higher dimensional feature space as is required by claim 24. Furthermore, no other passage of Toyama teaches or suggests a confidence level which is inversely proportional to a distance of a new feature of selected examples from a separating hyperplane in an induced higher dimensional feature space as is required by claim 24.

Furthermore, under an inherency argument, the fact that a certain characteristic may be present in the prior art is not sufficient to establish the inherency of that characteristic. MPEP 2112 citing *In re Rijckaert*, 9 F.3d 1531, 1534, 28 USPQ2d 1955, 1957 (Fed. Cir. 1993) (emphasis in original). In relying upon the theory of inherency, the examiner must provide a basis in fact and/or technical reasoning to reasonably support the determination that the allegedly inherent characteristic necessarily flows from the teachings of the applied prior art. MPEP 2112 citing *Ex parte Levy*, 17 USPQ2d 1461, 1464 (Bd. Pat. App. & Inter. 1990) (emphasis in original).

As previously noted, claim 24 requires inverse proportionality between the confidence level and the distance of a new feature of the selected examples from a separating hyperplane. The Applicants respectfully submit that Toyama fails to teach or suggest that the aesthetic score is calculated based on inverse proportionality. The Examiner has not explained, and it is not apparent, why the aesthetic score disclosed by Toyama is inherently inversely proportional to a distance of a new feature of the selected examples from a separating hyperplane in an induced higher dimensional feature space.

Moreover, obviousness cannot be established by combining prior art to produce the claimed invention absent some teaching or suggestion supporting the combination. *In re Fritch*, 972 F.2d 1260, 1266, 23 USPQ2d 1780, 1783-84 (Fed. Cir. 1992). The mere fact that the prior art may be modified in the manner suggested by an Examiner not does make the modification obvious unless the prior art suggested the desirability of the modification. *Id.*

The Examiner argues, "Using the broadest interpretation, the Examiner concludes at the time of the invention, one of ordinary skill of the art could modify Neal's teaching with Toyama teaching of enhancing the learned qualifier in such a way that wherein the at least one criterion includes a confidence level of the selected examples, the confidence level being inversely proportional to a distance of a new feature of the selected examples from a separating hyperplane in an induced higher dimensional feature space." OA, pg. 17.

Neal teaches that "[t]he third element is to classify the new items by comparing the words and symbols associated with each item to those in the knowledge database." Neal, col. 2, ln. 64-67. Neal then clarifies that "[i]n the present invention, a word, token, symbol or descriptive term can be considered as one or more characters used to represent a concept in a language or a specialized subject matter." Neal, col. 3, ln. 6-9. Thus, it is evident that Neal teaches that a search operates on textual data as opposed to the image itself. Furthermore, the confidence score (or confidence level) disclosed by Neal is derived from the result of a search.

Toyama teaches that when training the classifier, "... the aspects that the classifier can use may include such image features as: the presence and distribution of various colors; the various geometrical quantities and qualities of segmented parts of an image, such as position, orientation, moments, etc.; coefficients of various transformations of image regions, such

as Fourier analysis, Discrete Cosine Transform (DCT), wavelet analysis, etc.; and, higher-level representations of the image. These features are represented numerically as a 'feature vector,' which can be thought of as a series of numeric values that represent the image with respect to its image features." Toyama, col. 5, ln. 51-61. Toyama then clarifies that when analyzing a particular image, "[t]he classifier uses the same feature selection it applied against the set of training images to determine the aesthetic score for the image" Toyama, col. 7, ln. 9-11. Thus, it is evident that Toyama teaches classifying an image based on graphical properties of an image and numeric representations thereof. It is noted that Toyama teaches that an image may contain text. However, Toyama is devoid of any teaching that images are classified based on the contents or semantic meaning of any text contained therein.

Thus, the confidence score of Neal is derived from a search which operates on textual data. By contrast, Toyama teaches classifying an image based on graphical and numeric data. Thus, the search of Neal and the classification of Toyama are based on disparate data types. Those skilled in the art will appreciate that different types of data (e.g., numeric data, textual data and graphical data) require processing according to substantially different methods and algorithms. Therefore, the Applicants respectfully submit that it would not be obvious to amend the classification score disclosed by Neal with the Support Vector Machine (SVM) classifier disclosed by Toyama. In this light, it is apparent that the only suggestion for combining Stubler, LeBrun, Neal and Toyama in the manner advanced by the Examiner stems from hindsight knowledge impermissibly derived from the Applicant's disclosure.

For at least these reasons, claim 24 is believed allowable. The Applicants respectfully request reconsideration and allowance of claim 24.

Claim 25

Claim 25 is dependent on and further limits claim 16. Since claim 16 is believed allowable, claim 25 is also believed allowable for at least the same reasons as claim 16.

Claim 26

Claim 26 is rejected under the same rationale as claim 24. OA, pg. 16. Thus, claim 26 is believed allowable for at least the reasons provided above

regarding claim 24. The Applicants therefore respectfully request reconsideration and allowance of claim 26.

Claim 27

Claim 27 is dependent on and further limits claim 22. Since claim 22 is believed allowable, claim 27 is also believed allowable for at least the same reasons as claim 22.

Claim 28

Claim 28 is rejected under the same rationale as claim 24. OA, pg. 16. Thus, claim 28 is believed allowable for at least the reasons provided above regarding claim 24. The Applicants therefore respectfully request reconsideration and allowance of claim 28.

CONCLUSION

In view of the forgoing remarks, it is respectfully submitted that this case is now in condition for allowance and such action is respectfully requested. If any points remain at issue that the Examiner feels could best be resolved by a telephone interview, the Examiner is urged to contact the attorney below.

No fee is believed due with this Amendment, however, should such a fee be required please charge Deposit Account 50-0510 the required fee. Should any extensions of time be required, please consider this a petition thereof and charge Deposit Account 50-0510 the required fee.

Dated: October 2, 2007

Respectfully submitted,

/ido tuchman/
Ido Tuchman, Reg. No. 45,924
Law Office of Ido Tuchman
82-70 Beverly Road
Kew Gardens, NY 11415
Telephone (718) 544-1110
Facsimile (866) 607-8538